

State Water Resources Control Board

November 16, 2018

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7018 0680 0000 1017 6052

Mr. Lou Camara
Director of Public Works
City of Hanford
900 South Tenth Avenue
Hanford, California, 93230
lcamara@cityofhanfordca.com

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEM(S)
LOCATED AT CITY OF HANFORD AIRPORT, 775 FOGGY BOTTOM ROAD,
HANFORD**

Dear Mr. Camara:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on October 18, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Operating Permit Onsite – A copy of the current operating permit was not available at the time of inspection.	All	October 18, 2018	Ongoing	H&SC 25284(a); 23 CCR 2712(i)
2	Failure to Maintain Plot Plan/Site Map – An approved plot plan/site map indicating the location of the product piping, tanks, and auxiliary equipment with respect to buildings or other landmarks, was not available in CERS or onsite at the time of the inspection.	All	October 18, 2018	Ongoing	23 CCR 2711(a)(8)
3	Failure to Maintain Tank Information – In CERS, under corrosion protection, impressed current lists “no”; however, it should list “yes,” and isolation should list “no.”	All	October 18, 2018	Ongoing	H&SC 25286(a); 23 CCR 2711(a)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

No.	Violation	Tank	Start Date	Stop Date	Regulation
4	Failure to Provide Designated Operator (DO) Training – The DO training was due by July 1, 2018. The last training was performed on June 3, 2017. In addition, at least one of the facility employees present during operating hours shall have current training. More than one employee must be trained.	All	July 1, 2018	Ongoing	23 CCR 2715(c)
5	Failure to Maintain Financial Responsibility – The Chief Financial Officer letter is out dated and is required to be updated annually.	All	October 18, 2018	Ongoing	H&SC 25292.2; 23 CCR 2711(a)(11)
6	Failure to Tag Monitoring Equipment – The monitoring certification tags were not attached to the Jet A piping sump sensor, under dispenser containment sensor, and both line leak detectors (LLD).	All	October 18, 2018	Ongoing	23 CCR 2641(j)
7	Failure to Monitor Product Piping – The sensor located in the Jet A turbine sump was hanging above the sump and the sensor located in the Avgas turbine sump was not located at the lowest point, preventing it from detecting a leak at the earliest opportunity possible.	All	October 18, 2018	Ongoing	23 CCR 2630(d)
8	Failure to Maintain Monitoring Plan – In CERS, under tank monitoring, automatic tank gauging list “no”; however, it should list “yes.” Additionally, under record keeping, ATG testing results lists “no”; however, it should list “yes.”	All	October 18, 2018	Ongoing	H&SC 25286(a); 23 CCR 2641(h)
9	Failure to Perform Tank Lining Inspection – A tank lining inspection was performed for both tanks on March 23, 2012; however, the most recent tank lining inspection on April 4, 2018, was late and was performed only on the Avgas tank.	Avgas	April 1, 2017	April 4, 2018	23 CCR 2663(h)

No.	Violation	Tank	Start Date	Stop Date	Regulation
10	Failure to Perform Tank Lining Inspection – A tank lining inspection was performed for both tanks on March 23, 2012; however, there is no documentation supporting that the tank lining inspection performed on April 4, 2018, included the Jet A tank.	Jet A	April 1, 2017	Ongoing	23 CCR 2663(h)
11	Failure to Perform Annual Monitoring Certification (AMC) – AMC testing was performed on November 9, 2015; however, the subsequent AMC test performed on December 1, 2016, was late.	Avgas	December 1, 2016	December 1, 2016	23 CCR 2638
12	Failure to Install Monitoring Equipment According to Manufacturer's Instructions – The automatic tank gauge was observed with a wire splice enclosed in an epoxy-pack but was not enclosed within an explosion proof junction box. The wire splice for the ATG is required to be placed inside a weather proof electric junction box according to Veeder-Root's installation manual.	Avgas	October 18, 2018	Ongoing	23 CCR 2638(a)
13	Failure to Properly Close or Cease Operation of UST – The procedures for permanent tank closure were not followed.	Jet A	September 1, 2012	Ongoing	H&SC 25298; 23 CCR 2672
14	Failure to Perform Annual Monitoring Certification – AMC testing has not been performed.	Jet A	August 1, 2011	Ongoing	23 CCR 2670
15	Failure to Perform Annual Line Leak Detector (LLD) Testing – LLD testing has not been performed.	Jet A	August 1, 2008	Ongoing	H&SC 25292(b)(4)(C); 23 CCR 2663(h)
16	Failure to Perform Annual Spill Containment Testing – Spill containment testing has not been performed.	Jet A	August 1, 2011	Ongoing	H&SC 25284.2
17	Failure to Perform Secondary Containment Testing – Secondary containment testing has not been performed.	Jet A	August 1, 2011	Ongoing	23 CCR 2637(a)
18	Failure to Perform Annual Tank Integrity Test – Tank integrity testing has not been performed.	Jet A	December 26, 2013	Ongoing	23 CCR 2643(b)(1)
19	Failure to Monitor Tank – Continuous tank monitoring is not being performed.	Jet A	March 23, 2012	Ongoing	23 CCR 2641(a), 2641(j), 2643(b)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Kings County Environmental Health within sixty (60) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly DO report and any associated photos must be submitted as proof of compliance. Additionally, all sumps, the under dispenser containment, and spill containment must be cleared of liquid and debris.

Please send all compliance documentation to the following:

State Water Board

Mr. Douglas McDevitt
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
douglas.mcdevitt@waterboards.ca.gov


Local CUPA

Mr. Lee Johnson
Supervising Environmental Health Officer
Kings County Environmental Health
330 Campus Drive
Hanford, California 93230
lee.johnson@co.kings.ca.us

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5891, or by email at matthew.buffleben@waterboards.ca.gov.

Sincerely,



Dr. Matthew Buffleben
Supervising Water Resource Control Engineer
Acting Supervisor, UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Mr. Everett Ehda
Airport Manager
City of Hanford
eehda@cityofhanfordca.com

Mr. Lee Johnson
Supervising Environmental Health Officer
Kings County Environmental Health
lee.johnson@co.kings.ca.us

Mr. Luis Flores
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